AP/2193
JFW

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PATENT APPLICATION

ATTORNEY DOCKET NO. ___**10010316-1**___

IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): **Mehmet Sayal et al.**	Confirmation No.: **8853**
Application No.: **09/943,223**	Examiner: **Khatri, Anil**
Filing Date: **August 29, 2001**	Group Art Unit: **2193**

Title: **Method and System for Integrating Workflow Management Systems with Business-to-Business Interaction Standards**

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Alexandria, VA 22313-1450

TRANSMITTAL OF APPEAL BRIEF

Transmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on ___April 4, 2006___ .

The fee for filing this Appeal Brief is (37 CFR 1.17(c)) $500.00.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

☐(a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below:

☐ 1st Month $120	☐ 2nd Month $450	☐ 3rd Month $1020	☐ 4th Month $1590

☐ The extension fee has already been filed in this application.

☒(b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Please charge to Deposit Account 08-2025 the sum of ___$ 500___ . At any time during the pendency of this application, please charge any fees required or credit any overpayment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees. A duplicate copy of this sheet is enclosed.

☒ I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to:
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Respectfully submitted,

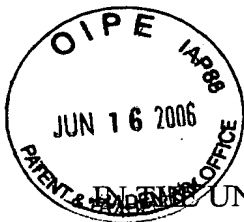Mehmet Sayal et al.

By _Barry D. Blount_

Barry D. Blount

Attorney/Agent for Applicant(s)

Reg No. :	35,067
Date :	June 12, 2006
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Rev 10/05 (AplBrief)

UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	§	
Mehmet Sayal et al.	§	Group Art Unit: 2193
	§	
Serial No.: 09/943,223	§	
	§	Examiner: Khatri, Anil
Filed: August 29, 2001	§	
	§	
For: METHOD AND SYSTEM FOR	§	Atty. Docket: 10010316-1
INTEGRATING WORKFLOW	§	NUHP:0387/BLT
MANAGEMENT SYSTEMS WITH	§	
BUSINESS-TO-BUSINESS	§	
INTERACTION STANDARDS	§	

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Alexandria, VA 22313-1450

APPEAL BRIEF PURSUANT TO 37 C.F.R. §§ 41.31 AND 41.37

This Appeal Brief is being filed in furtherance to the Notice of Appeal mailed on April 4, 2006, and received by the Patent Office on April 7, 2006. The time period for filing this Appeal Brief has been reset for one month from mailing of the Notice of Panel Decision from Pre-Appeal Brief Review mailed on May 17, 2006.

1.   REAL PARTY IN INTEREST

The real party in interest is Hewlett-Packard Development Company, LP, the Assignee of the above-referenced application by virtue of the Assignment to Hewlett-Packard Development Company, LP, recorded at reel 014061, frame 0492, and dated September 30, 2003. Hewlett-Packard Development Company, LP is a wholly-owned subsidiary of Hewlett-Packard Company. Accordingly, Hewlett-Packard Development Company, LP, will be directly affected by the Board's decision in the pending appeal.

2. **RELATED APPEALS AND INTERFERENCES**

Appellants are unaware of any other appeals or interferences related to this Appeal. The undersigned is Appellants' legal representative in this Appeal.

3. **STATUS OF CLAIMS**

Claims 1-18 are currently pending, are currently under final rejection and, thus, are the subject of this Appeal.

4. **STATUS OF AMENDMENTS**

As the instant claims have not been amended at any time, there are no outstanding amendments to be considered by the Board.

5. **SUMMARY OF CLAIMED SUBJECT MATTER**

Embodiments of the present invention relate generally to the field of electronic business technology. *See* Application, page 2, lines 5-7. Specifically, present embodiments relate to a system and method for integrating workflow management systems with business-to-business ("B2B") interaction standards (e.g., RosettaNet B2B interaction standards). *See id.* at page 2, lines 5-7; *see also* page 5, lines 13-16. Present embodiments enable automated, template-driven generation of processes and services that can interact according to B2B interaction standards. *See id.* at page 8, line 9 – page 9, line 4.

According to some embodiments, an automatic B2B template generator is provided for supporting workflow design. *See id.* The B2B template generator automatically generates process templates and service templates based either on a description of a B2B interaction standard that is received or a structured representation of the B2B interaction standard. *See id.* When the B2B template generator receives the description of the B2B interaction standard as input, the B2B template generator first converts the description into a structured representation. *See id.* A process template may be automatically generated based on the structured representation. *See id.* The template (e.g., B2B service template or B2B process template) may be utilized by a user to design both quickly and

efficiently a complete process (e.g., a workflow with B2B interaction points). *See id.*

The Application contains three independent claims, namely, claims 1, 11, and 17, all of which are the subject of this Appeal. The subject matter of these claims is summarized below.

With regard to the aspect of the invention set forth in independent claim 1, discussions of the recited features of claim 1 can be found at least in the below-cited locations of the specification and drawings. By way of example, an embodiment in accordance with the present invention relates to a method for supporting workflow design (e.g., 240). *See* Application, page 12, lines 7-16; *see also* page 13, line 7 – page 14, line 27; *see also* page 16, lines 6-8; *see also* Fig. 2. The method comprises receiving (e.g., 210) a description (e.g., 214) of a business-to-business interaction standard. *See* Application, page 8, lines 18-25; *see also* page 13, lines 1-16; *see also* page 16, lines 1-8; *see also* page 16, lines 1-12; *see also* Fig. 2. The method also comprises converting (e.g., 220) the description (e.g., 214) of business-to-business interaction standard to a structured representation (e.g., 224) of the business-to-business interaction standard. *See* Application, page 8, lines 21-25; *see also* page 13, lines 17-23; *see also* page 16, lines 1-12; *see also* page 26, lines 8-17; *see also* Fig. 2. Further, the method comprises automatically generating (e.g., 230) at least one process template (e.g., 174, 178, 234) based on the structured representation (e.g., 224) of the business-to-business interaction standard, and using the process template (e.g., 174, 178, 234) to design (e.g., 240) a workflow (e.g., 244). *See* Application, page 8, line 25 – page 9, line 4; *see also* page 13, lines 1-5; *see also* page 13, line 24 – page 14, line 17; *see also* page 15, lines 14-27; *see also* page 16, lines 13-27; *see also* page 19, line 31 – page 20, line 21; *see also* page 26, line 19 – page 27, line 14; *see also* Fig. 1, Fig 2, and Fig. 3.

With regard to the aspect of the invention set forth in independent claim 11, discussions of the recited features of claim 11 can be found at least in the below-cited locations of the specification and drawings. By way of example, an embodiment in accordance with the present invention relates to a method for supporting workflow design (e.g., 240). *See* Application, page 12, lines 7-16; *see*

also page 13, line 7 – page 14, line 27; *see also* page 16, lines 6-8; *see also* Fig. 2. The method comprises receiving (e.g., 210) a high-level process definition (e.g., 214). *See* Application, page 8, lines 18-25; *see also* page 13, lines 1-16; *see also* page 16, lines 1-8; *see also* page 16, lines 1-12; *see also* Fig. 2. The method also comprises converting (e.g., 220) the high-level process definition (e.g., 214) into a structured data and flow (e.g., 224). *See* Application, page 8, lines 21-25; *see also* page 13, lines 17-23; *see also* page 15, lines 14-27; *see also* page 16, lines 1-12; *see also* page 26, lines 8-17; *see also* Fig. 2. The method also comprises automatically extracting (e.g., 230) at least one business-to-business (B2B) interaction point (e.g., 238). *See* Application, page 13, lines 24-27; *see also* page 15, lines 14-27; *see also* Fig. 2. Further, the method comprises generating a business-to-business (B2B) service template for the extracted interaction point. *See* Application, page 8, line 15 – page 9, line 4; *see also* page 13, lines 1-5 and lines 24-27; *see also* page 15, line 1 – page 16, line 27; *see also* Fig. 1, Fig. 2, and Fig. 3.

With regard to the aspect of the invention set forth in independent claim 17, discussions of the recited features of claim 17 can be found at least in the below-cited locations of the specification and drawings. By way of example, an embodiment in accordance with the present invention relates to a system (e.g., 100) for supporting the design of workflows (e.g., 240). *See* Application, page 11, line 10 – page 12, line 16; *see also* page 13, line 7 – page 14, line 27; *see also* page 16, lines 6-8; *see also* Fig. 1 and Fig. 2. The method comprises a structured process definition generator (e.g., 110, 150) for receiving a description of a business-to-business interaction standard and responsive thereto for generating a structured business-to-business process definition (e.g., 214). *See* Application, page 12, lines 7-14; *see also* page 17, lines 1-20; *see also* Fig. 1 and Fig. 2. The system also comprises a process template generator (e.g., 170) for automatically generating a business-to-business process template (e.g., 174, 178, 234) based on a structured business-to-business process definition (e.g., 214); *see also* Fig. 1 and Fig. 2. *See* Application, page 12, lines 3-6; *see also* page 13, lines 1-5; *see also* page 15, line 1 – page 16, line 27; *see also* Fig. 1 and Fig. 2. Further, the system (e.g., 100) comprises a process template repository (e.g., 120) for storing the

business-to-business process templates (e.g., 174, 178, 234). *See* Application, page 12, lines 3-6; *see also* page 12, lines 15-23; *see also* Fig. 1.

6.   GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Ground of Rejection for Review on Appeal:

Appellants respectfully urge the Board to review and reverse the Examiner's first ground of rejection in which the Examiner rejected claims 1-18 under 35 U.S.C. § 102(e) as being anticipated by Notani et al. (U.S. Patent No. 6,442,528) ("Notani reference").

7.   ARGUMENT

As discussed in detail below, the Examiner has improperly rejected the pending claims. Further, the Examiner has misapplied long-standing and binding legal precedents and principles in rejecting the claims under 35 U.S.C. § 102. Accordingly, Appellants respectfully request full and favorable consideration by the Board, as Appellants assert that claims 1-18 are currently in condition for allowance.

A.   Ground of Rejection:

The Examiner rejected claims 1-18 under 35 U.S.C. § 102(e) as being anticipated by the Notani reference. Appellants respectfully traverse this rejection. Although the independent claims 1, 11, and 17 each contain different limitations, the Examiner did not address the distinctions. Accordingly, each of these independent claims will be discussed together below. Insomuch as the Examiner's rejection is identical on all of these claims, each of the independent claims are believed to be allowable for at least the reasons set forth herein. Additionally, dependent claims 3 and 8 are believed to be allowable for additional reasons, as set forth herein.

1.   **The Examiner's rejection of independent claims 1, 11, and 17.**

Independent claim 1 recites:

> 1.   A method for supporting workflow design comprising the steps of:
>
> a) receiving a description of a business-to-business interaction standard;
>
> b) converting the description of business-to-business interaction standard to a structured representation of the business-to-business interaction standard;
>
> c) automatically generating at least one process template based on the structured representation of the business-to-business interaction standard; and
>
> d) using the process template to design a workflow.

Independent claim 11 recites:

> 11.   A method for supporting workflow design comprising the steps of:
>
> a) receiving a high-level process definition;
>
> b) converting the high-level process definition into a structured data and flow;
>
> c) automatically extracting at least one business-to-business (B2B) interaction point; and
>
> d) generating a business-to-business (B2B) service template for the extracted interaction point.

Independent claim 17 recites:

> 17.   A system for supporting the design of workflows comprising:
>
> a structured process definition generator for receiving a description of a business-to-business interaction standard and responsive thereto for generating a structured business-to-business process definition;
>
> a process template generator for automatically generating a business-to-business process template based on a structured business-to-business process definition; and
>
> a process template repository for storing the business-to-business process templates.

In the First Office Action, with regard to the independent claims, the

Examiner stated:

> Notani et al teaches,
> receiving a description of a business-to-business
> interaction standard (summary of the invention);
> converting the description of business-to-business
> interaction standard to a structured representation of the
> business-to-business interaction standard (column 3, lines 39-
> 52);
> automatically generating at least one process template
> based on the structured representation of the business-to-
> business interaction standard (column 15, lines 35-47); and
> using the process template to design a workflow
> (column 17, lines 44-54).

First Office Action, pages 3-4.

In the Final Office Action, the Examiner stated the following with respect

to the independent claims in an omnibus rejection:

> As per applicant request claims 1-18 has been
> considered but they are not persuasive. Claims 1-18 stand
> rejected under 35 U.S.C. 102(e) as being anticipated by
> *Notani et al* USPN 6,442,528.
> In the remarks applicant argues,
> I) "Business to business interaction standard".
> II) "Converting the business to business interaction
> standard to a structured representation".
> III) "Automatically generating at least one process
> template based on the structured representation of B2B
> interaction standard".
> In response to applicant's arguments,
> I) It was noted that the cited reference teaches
> business-to-business interaction standard. Reference
> mentioned that workflow is disclosed in the design and
> deployment in a enterprise level and collaborating within the
> organization and multiple entries in multi domain
> environment which means that interaction and collaboration
> in and with business to business (column 3, lines 39-52).
> Therefore, limitations are met by the reference.
> II) It was also noted that reference also teaches
> converting the business to business interaction standard to a
> structured representation by using web enterprise and
> distributing the activities over the nodes in the node group to

achieve multi enterprise collaboration (column 12, lines 56-
67).

> Thus, limitations are met by the reference.
> III) It was noted that cited reference also
suggest that global collaboration designer provides a
tool to automatically generate a process template
based on the structured representation of B2B
interaction standard and also provide verification of
collaboration and automatic code generation and
allow more to be created as new version (column 6,
lines 8-32 and line 40-46). Therefore, limitations are
met by the reference.

Final Office Action, pages 2-3.

2.   **The Examiner's rejection of independent claims 1, 11, and 17 is
improper because the rejection fails to establish a *prima facie* case of
anticipation.**

Anticipation under 35 U.S.C. § 102 can be found only if a single reference

shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 778 F.2d 775,

227 U.S.P.Q. 773 (Fed. Cir. 1985). For a prior art reference to anticipate under 35

U.S.C. § 102, every element of the claimed invention must be identically shown

in a single reference. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir.

1990). To maintain a proper rejection under 35 U.S.C. § 102, a single reference

must teach each and every limitation of the rejected claim. *Atlas Powder v. E.I.

du Pont*, 750 F.2d 1569 (Fed. Cir. 1984). Accordingly, the Appellants needs only

point to a single element not found in the cited reference to demonstrate that the

cited reference fails to anticipate the claimed subject matter.

In regard to the Examiner's rejection of independent claim 1, the

Appellants respectfully assert that the Examiner has erroneously rejected claim 1

based on the Notani reference by asserting that the Notani reference discloses the

recited features relating to the "business-to-business interaction standard." Final

Office Action, page 2. Indeed, the Notani reference does not even mention a

business-to-business or B2B interaction standard. To emphasize this deficiency,

the portion of the Notani reference cited by the Examiner in the Final Office

Action as disclosing these claim features is set forth below:

> Improvement of decision support processes involves expansion to provide enterprise level and multi-enterprise level decision support for optimal decision making. Technologically and conceptually, providing enterprise-level and multi-enterprise level decision support differs from providing factory-level and supply-chain-level decision support. The reasons for this can be that, in multi-domain situations (such as business units within an enterprise or multiple enterprises), the different domains often operate different decision support software. Also, in multi-domain situations, one domain generally can not coerce another domain into making a particular decision. In other words, optimal decision support in this environment often needs to be performed in a negotiated, as opposed to coercive, environment.

Notani et al., col. 3, lines 39-52.

The discussion of "decision support" in "multi-domain situations," as set forth above in the cited portion of the reference, does not equate to a business-to-business interaction standard, as recited in claim 1. Further, the Notani reference does not disclose "receiving a description of a business-to-business interaction standard," "converting the description of business-to-business interaction standard," and so forth, as presently recited in claim 1. Accordingly, the Notani reference fails to disclose each and every feature of independent claim 1 and fails to support a *prima facie* case of anticipation under 35 U.S.C. § 102. In view of these deficiencies in the Notani reference, the Notani reference cannot anticipate independent claim 1 and its dependent claims.

Furthermore, the Applicant asserts that the Examiner's allegation that the Notani reference teaches "automatically generating at least one process *template* based on the structured representation of the business-to-business interaction standard," as recited in claim 1, is not correct. *See* Final Office Action, page 3. There is no disclosure whatsoever of a *process template* in the Notani reference. Regarding disclosure of this feature, on page 3 of the Final Office Action, the Examiner merely points to a discussion of a global collaboration designer (GCD) that is run by a global collaboration manager in the Notani reference. *See* Notani et al., col. 6, lines 8-32 and 40-46. The GCD and global collaboration manager

have no discernable relationship to the presently recited process template. Therefore, the Appellants assert that the Examiner has failed to establish a *prima facie* case for anticipation because the Examiner has not identified every element of claim 1 in the cited reference. In view of the arguments set forth above, the Appellants request an indication of allowance for claim 1 and its dependent claims.

As indicated above, the Examiner has not addressed the subject matter of independent claims 11 and 17 with any specificity. Rather, the Examiner grouped claims 1, 11 and 17 together in an omnibus rejection. As a result, the Examiner failed to directly address certain recitations in claim 17. For example, the Examiner provided no indication of where "a process template repository for storing the business-to-business process templates," as recited in claim 17 is found in the Natoni reference. It should be noted that, as set forth above with respect to claim 8, on pages 4 and 5 of the First Office Action, the Examiner suggested that a process template repository is disclosed in the Natoni reference. However, the cited portion of the reference merely discusses designing an inter-enterprise workflow that includes parameterization over groups. *See* Natoni et al., col. 13, lines 22-39. There is no discussion of a process template repository. Further, there is no discussion of storing business-to-business process templates. The Appellants assert that this element of claim 17 is completely missing from the Natoni reference. Accordingly, the Appellants respectfully request an indication of allowance for claim 17 and the claims depending therefrom.

3.   **The Examiner's rejection of dependent claims 3 and 8, which depend from independent claim 1.**

Dependent claim 3 recites:

> 3. The method of claim 1 wherein converting the description of the electronic business-to-business interaction standard to a structured representation of the business-to-business interaction standard includes
>
> for each state, defining all income transitions and all outgoing transitions; and
>
> for each transition, defining a source state and a target state.

Dependent claim 8 recites:

> 8. The method of claim 1 further comprising the steps of:
>
> storing the process templates into a process template repository; wherein the process templates are accessible to a workflow designer; and
>
> storing the service templates into a service template repository; wherein the service templates are accessible to a workflow designer.

In the First Office Action, with regard to dependent claims 3 and 8, the Examiner stated the following:

> Regarding claims 3 and 14
> *Notani et al teaches,*
> for each state, defining all incoming transitions and all outgoing transitions (column 12, lines 42-55); and
> for each transition, defining a source state and a target state (column 12, lines 10-19).
>
> Regarding claims 8-10 and 18
> *Notani et al teaches,*
> storing the process templates into a process template repository; wherein the process templates are accessible to a workflow designer (figures 10-16, column 13, lines 22-39); and storing the service templates repository; wherein the service templates are accessible to a workflow designer (column 14, lines 47-67).
>
> First Office Action, pages 4-5.

In the Final Office Action, the Examiner stated the following with respect to the dependent claims in an omnibus rejection:

> As per applicant request claims 1-18 has been considered but they are not persuasive. Claims 1-18 stand rejected under 35 U.S.C. 102(e) as being anticipated by *Notani et al* USPN 6,442,528.
> In the remarks applicant argues,
> I) "Business to business interaction standard".
> II) "Converting the business to business interaction standard to a structured representation".

III) "Automatically generating at least one process template based on the structured representation of B2B interaction standard".

In response to applicant's arguments,

I) It was noted that the cited reference teaches business-to-business interaction standard. Reference mentioned that workflow is disclosed in the design and deployment in a enterprise level and collaborating within the organization and multiple entries in multi domain environment which means that interaction and collaboration in and with business to business (column 3, lines 39-52). Therefore, limitations are met by the reference.

II) It was also noted that reference also teaches converting the business to business interaction standard to a structured representation by using web enterprise and distributing the activities over the nodes in the node group to achieve multi enterprise collaboration (column 12, lines 56-67).

Thus, limitations are met by the reference.

III) It was noted that cited reference also suggest that global collaboration designer provides a tool to automatically generate a process template based on the structured representation of B2B interaction standard and also provide verification of collaboration and automatic code generation and allow more to be created as new version (column 6, lines 8-32 and line 40-46). Therefore, limitations are met by the reference.

Final Office Action, pages 2-3.

4. **The Examiner's rejection of dependent claims 3 and 8 is improper because the rejection fails to establish a *prima facie* case of anticipation.**

The Appellants assert that the Natoni reference fails to anticipate dependent claim 3 because the Natoni reference fails to teach all of the recited features of claim 3. Dependent claim 3 recites, *inter alia*, "defining all income transitions and all outgoing transitions; and for each transition, defining a source state and a target state." These features of claim 3 are clearly not present in the Natoni reference. Accordingly, the Appellants assert that the Examiner erred in rejecting dependent claim 3 based on the Natoni reference. Indeed, the Examiner merely points to a discussion of parametric workflow (i.e., workflow that is parameterized over some variable and can be regular or distributed) at column 12,

lines 10-19 and 42-55 of the Notani reference as disclosing this feature. *See* First Office Action, page 4. Accordingly, the Natoni reference clearly does not support the rejection under 35 U.S.C. § 102. In view of this deficiency, the Appellants request an indication of allowable subject matter in dependent claim 3.

Additionally, Appellants assert that the Natoni reference fails to anticipate dependent claim 8 because the Natoni reference fails to teach all of the recited features of claim 8. The Examiner stated that the Natoni reference teaches "storing the process templates into a process template repository; wherein the process templates are accessible to a workflow designer; and storing the service templates in a service template repository; wherein the service templates are accessible to a workflow designer," as recited in claim 8. Regarding these features of claim 8, the Examiner pointed to a discussion in the Natoni reference relating to designing and deployment of an inter-enterprise workflow. *See* First Office Action, pages 4-5. However, there is no discussion whatsoever in the Natoni reference of storing service templates or process templates. Accordingly, the Natoni reference is insufficient to support the rejection under 35 U.S.C. § 102. In view of these deficiencies, the Appellants request an indication of allowable subject matter in claim 8.

5.   **The Examiner failed to properly reject claims 1-18 in view of 37 C.F.R. § 1.104(c)(2) and M.P.E.P. § 707.07.**

Appellants assert that the Examiner failed to meet the burden established in 37 C.F.R. § 1.104(c)(2), which states the following:

> When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable. The pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified.

37 C.F.R. § 1.104(c)(2); *see also* M.P.E.P. § 707.07.

As set forth above, in accordance with 37 C.F.R. § 1.104(a)(2), the Examiner is required to state the reasons for any adverse action or any objection. Further, "[w]hen ... prior art is cited, its pertinence should be explained."
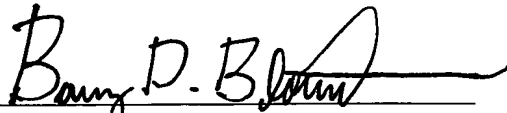
M.P.E.P. 707.05; *see* 37 C.F.R. § 1.104(c)(2). The Appellants assert that the Examiner's rejections are vague and inadequately explained regarding the various claim features. This is illustrated by the quoted passages from the First Office Action and Final Office Action set forth above. Accordingly, the Final Office Action was improperly made final. Thus, if the pending claims are not deemed allowable, Appellants request that the Application be returned to prosecution for additional substantive action by the Examiner.

Additionally, the Examiner merely rejected claims 1-18 as a group in an omnibus rejection. Final Office Action, pages 2-3. The Examiner failed to provide any detailed rejection of the specific claims. Applicants respectfully assert that "[a] plurality of claims should never be grouped together in a common rejection, unless that rejection is equally applicable to all claims in the group." M.P.E.P. § 707.07(d). Applicants assert that the Examiner improperly expressed the rejection by inappropriately grouping the claims together and has completely failed to address certain claim features, examples of which are discussed above. Accordingly, the Final Office Action was improperly made final. Thus, if the pending claims are not deemed allowable, Appellants request that the Application be returned to prosecution for additional substantive action by the Examiner.

Conclusion

Appellants respectfully submit that all pending claims are in condition for allowance. However, if the Examiner or Board wishes to resolve any other issues by way of a telephone conference, the Examiner or Board is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

Date: June 12, 2006

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8.   **APPENDIX OF CLAIMS ON APPEAL**

Listing of Claims:

1.   A method for supporting workflow design comprising the steps of:

   a)   receiving a description of a business-to-business interaction standard;

   b)   converting the description of business-to-business interaction standard to a structured representation of the business-to-business interaction standard;

   c)   automatically generating at least one process template based on the structured representation of the business-to-business interaction standard; and

   d)   using the process template to design a workflow.

2.   The method of claim 1 wherein the description of an electronic business-to-business interaction standard includes a description of one of RosettaNet, CBL, EDI, OSI, and cXML.

3.   The method of claim 1 wherein converting the description of the electronic business-to-business interaction standard to a structured representation of the business-to-business interaction standard includes

      for each state, defining all income transitions and all outgoing
         transitions; and

      for each transition, defining a source state and a target state.

4.   The method of claim 1 wherein converting the description of the electronic business-to-business interaction standard to a structured representation of the business-to-business interaction standard further includes

representing data in a structured form by employing a mark-up language.

5.   The method of claim 1 wherein the structured process definition includes structured data and structured data flow.

6.   The method of claim 1 wherein the structured process definition includes an XMI that includes at least one XML document.

7.   The method of claim 1 wherein automatically converting the structured data and flow into at least one process template includes

        automatically converting the structured data and flow into at least
                one process template that is specific to a particular workflow
                management system.

8.   The method of claim 1 further comprising the steps of:

        storing the process templates into a process template repository;
                wherein the process templates are accessible to a workflow
                designer; and

        storing the service templates into a service template repository;
                wherein the service templates are accessible to a workflow
                designer.

9.   The method of claim 1 wherein using the process template to design a workflow includes

   retrieving a process template from the process template repository;
and

   adding at least one local service to the process template.

10.   The method of claim 1 wherein using the process template to design a workflow includes

   designing a process that includes a plurality of local services; and

   adding at least one interaction point service to the process.

11.   A method for supporting workflow design comprising the steps of:

a)   receiving a high-level process definition;

b)   converting the high-level process definition into a structured data and flow;

c)   automatically extracting at least one business-to-business (B2B) interaction point; and

d)   generating a business-to-business (B2B) service template for the extracted interaction point.

12.   The method of claim 11 further comprising:

   automatically extracting a plurality of business-to-business (B2B) interaction points; and

   generating a business-to-business (B2B) service template for each extracted interaction point.

13.   The method of claim 11 wherein the business-to-business (B2B) service template confirms to a business-to-business interaction standard that includes one of RosettaNet, CBL, EDI, OBI, and cXML.

14.   The method of claim 11 wherein converting the high-level process definition into a structured data and flow includes

> for each state, defining all incoming transitions and all outgoing transitions; and

> for each transition, defining a source state and a target state.

15.   The method of claim 11 wherein converting the high-level process definition into a structured data and flow includes

> representing data in a structured form by employing a mark-up language.

16.   The method of claim 11 wherein the structured process definition includes an XMI that includes at least one SML document.

17.   A system for supporting the design of workflows comprising:

> a structured process definition generator for receiving a description of a business-to-business interaction standard and responsive thereto for generating a structured business-to-business process definition;

> a process template generator for automatically generating a business-to-business process template based on a structured business-to-business process definition; and

> a process template repository for storing the business-to-business process templates.

18.   The system of claim 17 further comprising:

a service template repository for storing business-to-business service
templates.

9. **<u>APPENDIX OF EVIDENCE</u>**

None.

10.   **APPENDIX OF RELATED PROCEEDINGS**

None.